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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Estados Unidos Mexicanos,
Plaintiff,

vs.

Diamondback Shooting Sports, Inc.,
et al.,
Defendants.

**NOTICE REGARDING
DEFENDANTS' PENDING
MOTIONS TO COMPEL**

No. 4:22-cv-00472-TUC-RM

Plaintiff Estados Unidos Mexicanos submits this Notice Regarding Defendants' Pending Motions to Compel.

I. Notice to the Court that Defendants have provided proposed search terms and custodians.

On April 15, 2025, Defendants filed a Motion to Compel Answers to Interrogatories (ECF 122), a Motion to Compel Plaintiff to Respond to Defendants' First Set of Requests for Production and for Sanctions (ECF 123), and a Motion to Compel Responses to Defendants' Second Set of Requests for Production and for Sanctions (ECF 124). Plaintiff, the Government of Mexico, filed oppositions to these motions on May 15, 2025 (ECF 137 and ECF 138), and Defendants filed a combined reply on May 29, 2025 (ECF 142).

The pending dispute over Defendants' discovery requests partially concerns whether the parties needed to confer "on agreed custodians and search terms as required

1 by this Court’s discovery protocol order.” *See, e.g.*, ECF Nos. 137, at 2, 3, 6, 8; 138, at 2,
 2 6; *see also* ECF No. 122-11, at 11 (letter from the Government to Defendants prior to the
 3 filing of the pending motions requesting “that Defendants provide a proposed protocol for
 4 email searches . . . , including both a list of proposed custodians and a list of proposed
 5 search terms.”).

6
 7 On August 11, 2025, Mr. Jeffrey Malsch, writing on behalf of all Defendants, sent
 8 a letter to Plaintiff providing proposed search terms and custodians.
 9

10 The Government has reviewed the proposal for search terms and custodians, and
 11 intends to respond in writing, after which the Government anticipates that the parties will
 12 meet and confer regarding any outstanding issues in dispute concerning search terms and
 13 custodians.
 14

15 **II. The Government will provide additional information or updates as**
 16 **requested.**

17 The Government will provide any additional details or updates requested by the
 18 Court.
 19

20 Respectfully submitted this 27th day of August, 2025.

21 DECONCINI McDONALD YETWIN & LACY, P.C.

22 By: /s/Ryan O’Neal

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CERTIFICATE OF SERVICE

I, Ryan O’Neal, hereby certify that this document was filed with the Clerk of the Court via CM/ECF. Those attorneys who are registered with the Court’s electronic filing systems may access this filing through the Court’s CM/ECF system, and notice of this filing will be sent to these parties by operation of the Court’s electronic filings system.

Dated: August 27, 2025

/s/ Ryan O’Neal
Ryan O’Neal

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